

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

JAMES E. JOHNSON  
*Corporation Counsel*

PETER W. BROCKER  
*Assistant Corporation Counsel*  
Phone: (212) 356-2332  
Fax: (212) 356-3509  
pbrocke@law.nyc.gov


May 12, 2021

**BY ECF**

Hon. P. Kevin Castel, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Application Granted.

So Ordered:

  
Hon. P. Kevin Castel, U.S.D.J.

5-12-21

Re: Kevin Monahan, et al. v. City of New York,  
20 Civ. 2610 (PKC)

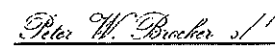
Your Honor:

I am the attorney assigned to the defense of the above-referenced matter, and I write to respectfully request an extension of time from May 19, 2021 to June 2, 2021 for defendant to file its motion for summary judgment and opposition to plaintiffs' partial motion for summary judgment. This is defendant's first request for an extension and plaintiffs consent to this request.

Defense counsel in this matter has worked diligently to prepare these motions for submission. However, due to the confluence of summary judgment motion practice in another matter (*Curtis McDaniel v. City of New York, et al.*, 19 Civ. 8375 (AJN) (RWL)) and the continued delays occasioned by remote working due to the ongoing Covid-19 public health emergency, which has limited counsel's access to the video evidence in this matter, an extension of time is needed to effectively prepare these motions.

Accordingly, defendant respectfully requests an extension of time from May 19, 2021 until June 2, 2020 for defendant to file its motion for summary judgment and opposition to plaintiff's partial motion for summary judgment.

Respectfully submitted,

  
Peter W. Brocker, Esq.  
*Assistant Corporation Counsel*

cc: All counsel of record (via ECF)